

Basic Maintenance Issues

A better definition needs to be developed for what is included and not included as Basic Maintenance for Internal Connections.

Currently it appears that the definition is based more on a time and materials support concept than on a maintenance concept. Where a customer pays a flat fee for each device or location based on the number and type of devices that are installed at a location and on defined service level agreements for support. Granted there is not an industry standard definition of maintenance and support.

The definition of Basic maintenance should include items that are preventative to ensure connection to the school or district location is maintained, in other words it should be proactive and not always reactive. This is especially important for equipment that is more than 3 years old. Since Basic Maintenance does not fall under the “Two Out of Five Rule” it should continue to consider as a recurring service. However, by allowing maintenance support to be more proactive, the expenses for the School Districts and other entities utilizing E-Rate funds would be reduced. Further definition needs to be done on what is considered covered for Help Desk services as part of the Basic Maintenance. Currently, the only definition is “that provides a comprehensive level of support beyond basic maintenance of only eligible equipment” What is the definition of “comprehensive level”. Staff answering a phone or putting service requests into an automated system to ensure a maintenance staff member is sent to a location should not be considered comprehensive support.

Various ways to package maintenance which includes a service provider have the staff available, with the appropriate parts when a device fails with specified Service Level Agreements which meet District defined business needs, should be allowed over a Time and Materials type contract, which costs the Districts quite a bit more money.

The evaluation of Basic Maintenance Applications should be based on the type of Contract, either Time and Materials, or Monthly Maintenance. The FCC should come up with evaluation criteria which meet the type of contract, not one size fits all.

For example,

- Provide greater clarity on required documentation
 - Develop spreadsheets or templates on what is the minimum information needed when filing an application

- For time and materials type contracts, detailed materials and labor estimates are needed.
- For Maintenance Contracts, a vendor is charging a customer by device, so a File Server that is allowed for coverage would be charged at a flat monthly rate. For example, \$45/mo for that device. During review the reviewer should only be interested in the \$45/mo not the total costs of parts and labor hours. Since it is the vendor that is a risk if failures cause the costs that were estimated for the Provider to come up with the monthly amount are exceeded.
- Allow dedicated maintenance when it is cost effective
 - Have an independent outside firm do a study or provide information when dedicated maintenance is more cost effective then time and materials. Then have reviewers set some parameters and guidelines to follow when reviewing applications. There should a formula that would include dollar, size of district, location and threshold parameters that may require another reviewer.

Other comments that have been provided to us by the School Districts include:

Processing applications

- Takes over a year to review and process
- Many times multiple reviews by multiple reviewers
- Same questions from multiple reviewers, they don't seem to share information already provided
- Required to send the same contracts and other documents multiple times – thousand of pages
- Multi-year contracts required to go through same process each year even after all questions answered and application funded in prior year

Invoicing

- Multiple reviewers
- Ask for the same information provided to application reviewers, which is already on-file at the SLD
- Processing invoices in a number of cases could taking over 180 days

Other issues

- Emphasis on time and material contract however with large district dedicated maintenance is more cost effective
- Large number of issues regarding servers

Maintenance Recommendations:

- Should be priority one, with telecommunications
- Monitoring should be allowed to determine if site or device is connect and functioning
 - Helps to reduces the need to send a technician out to the site